

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A404325747

FACILITY: Dow Corning - Midland Plant		SRN / ID: A4043
LOCATION: 3901 S Saginaw Rd, MIDLAND		DISTRICT: Saginaw Bay
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Mike Gruber , Air & Water Team Leader		ACTIVITY DATE: 06/10/2014
STAFF: Jennifer Lang	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: EU601-01, EU2703-01, EU800-01 & EU604-08 - Scheduled Inspection		
RESOLVED COMPLAINTS:		

Inspection date: 6/10/14

Inspection started: 9:00 am

Inspection ended: 12:10 pm

Dow Corning and MDEQ-AQD staff present during the inspection.

Jenny Lang (MDEQ-AQD, Environment Engineer Specialist)

Steve Moser (Dow Corning, Assistant General Council)

Mike Gruber (Dow Corning, Air & Water Team Leader)

EU601-01

Compliance Status: Undetermined (inspection could not be completed)

Items noted during the inspection.

1. EU601-01 covers the alkoxylation process. I did not inspect this process as it was down for maintenance. I did, however, ask Dow Corning (hereinafter "DC") about a couple of MON (40 CFR Part 63, Subpart FFFF) test reports for scrubber nos. 24683 and 5309 (emergency vent scrubber). According to the ROP, EU601-01 is equipped with three scrubbers including scrubber nos. 24683, 5360 (backup to scrubber no. 24683), and 5309 (emergency vent scrubber).

DC completed MON testing for scrubber 24683 on 8/7/13. According to page 2 of the test report, scrubber nos. 5360 and 24683 operate in parallel. I asked DC during the inspection if they conducted MON testing for scrubber 5360. DC indicated they had, but the scrubber did not meet the MON requirements, so they did not submit the report. I was informed later that DC no longer uses scrubber 5360.

DC completed MON testing for emergency scrubber 5309 on 10/23/13. According to page 5 of the test report, MON continuous process vents that do not have MACT level control equipment have to have a TRE greater than 1.9. DC conducted testing on scrubber 5309 to confirm that this source has a TRE greater than 1.9 and is therefore Group 2 not requiring MACT level control.

During my inspection, DC informed me that they have since decided that they will not be venting to the scrubbers once EU601-01 is subject to the MON, as they discovered during testing that there is MeCl (methyl chloride) in the vent. DC further informed me that once the MON applies, they will be

venting EU601-01 to the site-wide THROX, and they'll also operate the columns differently to control emissions.

I did not ask during the inspection which vent(s) contained MeCl. Therefore, in an email dated 6/12/14, I followed up with Mike regarding this question and whether or not DC determined if the PTI needs to be revised to address MeCl in the vent (see attached). It should be noted that DC did not report this as a non-compliance issue in their Title V ROP annual deviation report for 2013.

In an email dated 6/23/14, Mike provided the following response: *For unrelated reasons, a project was underway – and is still in process – to revise the permit provisions governing EU601-01 when the MeCl in vent SV601-026 (scrubber no. 24683) was discovered. Dow Corning determined that no deviation had occurred, in part because the presence of MeCl in the normal vent stream was previously unknown and had not been considered in setting applicable permit limits and because the total VOC limits were not exceeded even taking the new MeCl data into account. The updated permit will address as appropriate the newly-discovered information concerning MeCl and emissions during normal operation of the process.*

During an unrelated inspection on 6/24/14, Mike, Steve and I discussed this issue further. I asked Mike if DC had modeled emissions of MeCl from vent no. SV601-026. Mike said they had not done this as MeCl emissions from SV601-026 are less than 1 lb/hr. According to PTI 534-77G which covers EU601-01, SV601-005 (associated with scrubber no. 5309 and a neighboring vent) has a MeCl emission limit of 200 lbs/hr. Because MeCl emissions from vent no. SV601-026 are small in comparison to MeCl emissions from vent no. SV601-005, MeCl emissions from vent no. SV601-026 would have little to no effect on modeling. I agreed with Mike on the predicted modeling results.

Mike and I further agreed that the change is likely exempt from permitting pursuant to AQD Rule 285 (b) or (c).

EU2703-01

Compliance Status: Undetermined (inspection could not be completed)

Items noted during the inspection.

1. EU2703-01 covers the hydrosilylation and alkoxylation process. I did not inspect this process as it was down for maintenance.

EU800-01

Compliance Status: Compliance

Items noted during the inspection.

1. EU800-01 covers the 800 block tank farm consisting of storage and transfer operations for on-site waste liquids. DC stated during my inspection that wastes stored at the 800 block tank farm are shipped off-site for incineration. EU800-01 is equipped with the following APC equipment: nitrogen (N₂) blanket. EU800-01 is no longer equipped with scrubber no. 19790 as they're no longer handling chlorosilanes in a manner that would require the scrubber. Therefore, the monitoring/recordkeeping requirement in condition no. VI.1 of table EU800-01 of ROP No. MI-ROP-A4043-2008 (hereinafter "ROP") no longer applies.
2. Condition no. VI.1 of table EU800-01 of the ROP states, DC shall monitor and record, on a per shift basis, the N₂ pressure blanket differential (i.e., difference between the N₂ inlet and tank exhaust regulator pressures). Condition no. III.1 of the same table in the ROP states, a properly operating N₂ pressure blanket will have a pressure differential of not less than 5 psig between the N₂ inlet and tank exhaust regulator pressures.

Based upon data collected during the inspection and upon further discussion following the inspection, it was discovered that DC is not monitoring and recording the pressure blanket differential between the N2 inlet and tank exhaust regulators. However, Mike explained that as long as the tank pressure does not exceed 8 psig, there are no emissions from the tank. Per the attached daily tank farm inspection log, operators observe these gauges (and other gauges) on a daily basis. Mike further explained that the N2 inlet pressure for each tank is maintained at 3 psig.

Mike and I agreed that condition nos. VI.1 and III.1 of table EU800-01 of the ROP do not accurately reflect DC's monitoring and recordkeeping procedures for determining compliance. Therefore, I suggested they submit a PTI application to revise the conditions to match their current monitoring and recordkeeping procedures. DC agreed to submit a PTI application by mid-September 2014 to correct the situation.

In my opinion, this is not a non-compliance situation for the following reasons:

- a) DC demonstrated during the inspection that they are monitoring and recording the pressure gauges on a per shift basis in order to demonstrate that the N2 pressure blanket is operating properly and controlling emissions from the tanks.
- b) Based upon item no. 3 below, all observed tank pressure readings were less than 8 psig during my inspection.
- c) Finally, as discussed in item no. 5 below, the 12-month rolling total VOC and non-VOC emissions through April 2014 for EU800-01 was 0.0 tpy for each, respectively.
- d) DC agreed to submit a PTI application to correct this situation by mid-September 2014.

Therefore, based upon this information, a VN for this issue was not written and the facility was marked as being in compliance in my inspection report.

- 3. Kevin Tyrrell (DC Head Operator) showed me the tank pressure gauges on each of the 6 tanks. These pressure gauges are not monitored in the control room. Instead, they are observed by operators on their daily walkthrough. At approximately 11:30 am, I recorded the following pressure values for each of the tanks.

Tank No.	Tank Pressure Gauge Reading (psig)**
19782	4
19781	4
19783	5
19786	5
19784	7
19785	5

**It should be noted that these tanks vent to atmosphere if the tank pressure gauge exceeds 8 psig.

- 4. Condition no. VI.2 of table EU800-01 of the ROP states, in part, DC shall record the date, amount of liquid waste transferred, and the type of transfer (e.g. dempster, tank truck, drum, vacuum transfer, etc.) for each transfer of liquid waste to and from each storage tank and for each dempster depressurization. DC told me during the inspection that they are no longer conducting dempster depressurizations. During the inspection, Chad Lisiecki (DC 800 Block Team Leader) showed me the written log for June 2014. I requested a copy of the log. On 6/23/14, I received the requested copy (see attached). Based upon this information, DC appears to be complying with the requirements of this condition.
- 5. Condition no. VI.3 of table EU800-01 of the ROP states, in part, within 30 days following the end of each calendar month, DC shall calculate and record emissions from the process for the previous calendar month to demonstrate compliance with the 12-month rolling time period emission totals specified in table EU800-01. Condition nos. I.7 and 9 of the same table in the ROP limits VOC and non-VOC emissions to 0.67 and 0.04 tpy, respectively. During the inspection, I asked for the 12-month rolling total VOC and non-VOC emissions through April 2014 for EU800-01. On 6/23/14, I received the requested information. According to data provided by DC (see attached), the 12-month

rolling total VOC and non-VOC emissions through April 2014 for EU800-01 was 0.0 tpy for each, respectively.

EU604-08

Compliance Status: Compliance

Items noted during the inspection.

1. EU604-08 covers the fluoro cyclics process. EU604-08 is equipped with the following air pollution control (APC) equipment: Freon-cooled condenser (7791), spray tower scrubber (22753), service water condenser (22713), and vent vapor equalization during railcar unloading operations when not venting to atmosphere through condenser no. 7791.
2. Condition no. V.1 of table EU604-08 of the ROP states, in part, DC shall verify the VOC and HCl emission rates from EU604-08 by testing at owner's expense, on or before six months of the ROP expiration date. DC shall submit a complete test report of the test results to the District Supervisor or the Technical Programs Unit within 60 days following the last date of the test. Pursuant to these requirements, DC conducted testing on 5/11/11. The test report was received on 7/11/11. Results of the test indicate compliance with the lb/hr VOC and HCl emission rates specified in table EU604-08.
3. Condition no. VI.1 of table EU604-08 of the ROP states, in part, during railcar unloading, DC shall monitor and record, on a continuous basis (i.e., at least once every 15-minutes), the condensate temperature of freon-cooled condenser no. 7791. Condition no. III.1 of the same table in the ROP states, in part, during railcar unloading operations if venting to the atmosphere, the condensate temperature from condenser no. 7791 shall not exceed 40.6 degrees F (4.8 degrees C). At approximately 11:45 am, I observed the following operational parameter data for freon-cooled condenser no. 7791 in the control room for EU604-08 at Building 604. Charlie Ciarkowski (DC Manufacturing Engineer) provided the data. Condenser no. 7791 controls emissions from the rail car unloading station when DC is not using vent vapor equalization and venting to atmosphere. DC was not unloading a railcar at the time of my inspection.

Operational Parameter	Observed Value	Alarm Set Point***
Freon-cooled condenser no. 7791 condensate temperature	25.9 degrees C** (instantaneous)	Lo ≤ -20 degrees C Hi ≥ 4.75 degrees C

**EU604-08 was not unloading a railcar at the time of my inspection, therefore the observed condensate temperature value is acceptable.

*** All alarm set points are instantaneous.

DC also informed me during the inspection that they usually offload railcars once a week for 4 – 6 hours, and they almost always vent to the condenser instead of using vent vapor equalization.

4. Condition no. VI.2 of table EU604-08 of the ROP states, in part, DC shall monitor and record, on a per shift basis, the spray tower scrubber (22753) liquid flow rate. Condition no. III.2 of the same table in the ROP states, the liquid flow rate of scrubber 22753 shall be at least 3.0 gallons per minute. At approximately 11:40 am, I observed the following operational parameter data for spray tower scrubber 22753 in the control room for EU604-08 at Building 604. Charlie Ciarkowski (DC Manufacturing Engineer) provided the data. Scrubber no. 22753 controls emissions from tanks and condenser vents. DC was operating equipment which vents to the scrubber at the time of my inspection. It should be noted that when the ROP was issued, DC did not have this operational parameter tied into PI and DCS. Since that time, this parameter is now monitored/recorded continuously in PI and DCS.

Operational Parameter	Observed Value	Alarm Set Point**
Spray tower scrubber no. 22753 liquid flow rate	1933 lb/hr (3.8 gpm) (instantaneous)	Lo ≤ 1500 lb/hr (3 gpm) Hi ≥ 4000 lb/hr (8 gpm)

** All alarm set points are instantaneous.

5. Condition no. VI.3 of table EU604-08 of the ROP states, in part, DC shall monitor and record, on a per shift basis, the service water return temperature of condenser no. 22713. Condition no. III.3 of the

same table in the ROP states, if the service water return temperature for condenser no. 22713 exceeds 105 degrees F (40.6 degrees C), DC shall implement corrective action and maintain a record of action taken to prevent reoccurrence. At approximately 11:50 am, I observed the following operational parameter data for condenser no. 22713 in the control room for EU604-08 at Building 604. Charlie Ciarkowski (DC Manufacturing Engineer) provided the data. Condenser no. 22713 controls emissions from a mixing kettle which was operating at the time of my inspection. It should be noted that when the ROP was issued, DC did not have this operational parameter tied into PI and DCS. Since that time, this parameter is now monitored/recorded continuously in PI and DCS.

Operational Parameter	Observed Value	Alarm Set Point**
Condenser no. 22713 service water return temperature	21.1 degrees C (instantaneous)	Lo ≤ -20 degrees C Hi ≥ 35 degrees C

** All alarm set points are instantaneous.

- Condition no. VI.4 of table EU604-08 of the ROP states, in part, within 30 days following the end of each calendar month, DC shall calculate and record emissions from the process for the previous calendar month to demonstrate compliance with the 12-month rolling time period emission totals specified in table EU604-08. Condition no. I.2 of the same table in the ROP limits VOC emissions from EU604-08 to 11.8 tpy. During the inspection, I asked for the 12-month rolling total VOC emissions through April 2014 for EU604-08. On 6/23/14, I received the requested information. According to data provided by DC (see attached), the 12-month rolling total VOC emissions through April 2014 for EU604-08 was 0.44 tpy.
- Condition no. VI.5 of table EU604-08 of the ROP states, DC shall maintain a record of all railcar unloading operations. At a minimum, this record shall include the date, time and duration of all railcar unloading operations. During the inspection, DC showed me their log. According to the log, to date, DC has conducted two railcar unloading operations in June 2014. These operations occurred on 6/3/14 from 18:00 – 21:00, and on 6/4/14 from 7:25 am – 11:15 am. All transfers are from the railcar to tank no. 8065. DC also recorded the type of chemical and the quantity of the transfer, however, this information is not included in my inspection report as DC considers it confidential information.

Condition no. VII.4 of table EU604-08 of the ROP states, each semiannual report of deviations shall include summary information on the number, duration and cause of CAM excursions and/or exceedances and the corrective actions taken. Condition no. VII.5 of the same table in the ROP states, each semiannual report of deviations shall include summary information on the number, duration and cause (including unknown cause, if applicable) for CAM monitor downtime incidents (other than monitor downtime associated with zero and span or other daily calibration checks, if applicable). According to the latest ROP deviation report received on 3/14/14 for reporting period 1/1/13 through 12/31/13, there were no CAM excursions and/or exceedances or monitor downtime incidents for EU604-08.

NAME Jerrya Tang DATE 7/1/14 SUPERVISOR C. Hill

Lang, Jennifer (DEQ)

From: steve.moser@dowcorning.com
Sent: Monday, June 23, 2014 10:46 AM
To: Lang, Jennifer (DEQ)
Subject: Follow up to June 10 Inspection
Attachments: DC006151 - DC006152 - Follow up Information to 6-10-2014 Inspection.pdf; DC006121 - FG432BOILERS Condition VI.4._Fuel Use and Capacity Factors.pdf; DC006122 - DC006124 - FG432BOILERS Condition VI.5._24-hr Rolling NOx Avg.pdf; DC006143 - DC006148 - EU800-01 Condition VI.2._Waste Transfers.pdf; DC006149 - DC006150 - EU800-01 Daily Tank Farm Inspection Log.pdf

Jennifer,

Attached is most of the follow up information you requested during your recent inspection and your email of 6/12/2014. Because of its size, I am sending you the SSM Plan for the 432 Boilers in a separate note shortly. Also in anticipation of tomorrow's meeting, I will send you a list of the plant's Rule 290 units.

Hope your time away from the office was relaxing. See you tomorrow.

Steve

Stephen V. Moser
Assistant General Counsel
Dow Corning Corporation
2200 W. Saizburg Rd. - CO1282
PO Box 994
Midland, MI 48686-0994
Phone: 989-496-5843
Fax: 989-496-6663
Email: steve.moser@dowcorning.com

RCVD BY MDEQ-A&D ON 6/23/14

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Information Requested During 06/10/2014 Inspection

A. FG432Boilers (ROP Mark-up Condition VI.4. and VI.7.)

Average fuel use records, capacity factors and operating ranges

Attached are the monthly natural gas usages and capacity factors for Boilers #12, #13 and #14 and the rolling 12-month averages for each.

See Document DC006121. NOTE: This document is marked "Dow Corning PROPRIETARY" and contains Confidential Business Information.

It should be maintained in a confidential file separate from other, public information provided by Dow Corning Corporation to the MDEQ.

B. FG432Boilers (ROP Mark-up Condition VI.5.)

24-hour rolling NOx emissions

The software program has been modified to write a standard report showing 24-hour rolling average NOx emissions for each boiler. See

Document DC006122 - 6124.

C. SSM Plan for FG432Boilers:

Attached for your convenience is the most recent SSM plan for the 432 Boilers. This plan was sent to the MDEQ by letter dated April 15, 2013.

See Document DC006125 - 6142. NOTE: This document is marked "Dow Corning PROPRIETARY" and contains Confidential Business Information.

It should be maintained in a confidential file separate from other, public information provided by Dow Corning Corporation to the MDEQ.

D. EU604-08 (ROP Mark-up Condition VI.4.)

VOC Emissions (12-month rolling total as of end of April 2014):

0.44 TPY (889.4 lbs/yr)

E. EU800-01 (ROP Mark-up Condition VI.3.)

VOC Emissions (12-month rolling total as of end of April 2014):

0.0 TPY (0.0 lbs/yr)

Non-VOC Emissions (12-month rolling total as of end of April 2014):

0.0 TPY (0.0 lbs/yr)

F. EU800-01 (ROP Mark-up Condition VI.2.)

Waste transfer data

See Document DC006143 - 6148.

RCVD BY MDEQ-AQD ON 6/23/14

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Follow Up Questions (06/12/2014 Email)

1. **EU601-01**

For unrelated reasons, a project was underway - and is still in process - to revise the permit provisions governing EU601-01 when the MeCl in vent SV601-026 (scrubber no. 24683) was discovered. Dow Corning determined that no deviation had occurred, in part because the presence of MeCl in the normal vent stream was previously unknown and had not been considered in setting applicable permit limits and because the total VOC limits were not exceeded even taking the new MeCl data into account. The updated permit will address as appropriate the newly-discovered information concerning MeCl emissions during normal operation of the process.

2. **EU800-01 (ROP Mark-up Condition III. And VI.1.)**

Dow Corning maintains a N2 pressure blanket through the use of properly operating pressure regulators. N2 inlet pressure is set at 3 psig and outlet pressure at 8 psig, thereby assuring that the required pressure differential is maintained. The regulators, along with pumps, piping, valves and other components, of each of the six tanks in the tank farm are inspected daily to verify they are in proper working condition. See Daily Tank Farm Inspection Log, Document DC006149 - 6150.

The gauge readings you recorded during the June 10 inspection were readings of actual tank pressure (in psig), not outlet pressure. As should be expected, all the readings ranged between 3 and 8 psig.



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Daily Tank Farm Inspection Log
Dow Corning Midland Licensed Hazardous Waste Facility
MID 000 809 632

Instructions

Column Number:

1. **Date:** Write in the date of the inspection.
2. **Tanks, pumps, piping, valves, vents, gauges, N₂ blanket:** For each tank – Are the tanks in good shape, with no dents or leaks? Is all ancillary equipment in good working order and not leaking, including piping, pumps, valves, tank vents, tank pressure gauges. Is the overfill protection alarm in good working order? Check if "OK", otherwise describe problems in Column 5.
3. **Dike & pads:** Are the tank farm pad and dike, and the tanker loading pads in good condition, the coating intact, no cracks or gaps? Is there any accumulated precipitation or waste from spillage that has not been removed within 24 hours? Check if "OK", otherwise describe problems in Column 5.
4. **Water tanker:** If there is a water tanker spotted on the tanker loading area adjacent to the tank farm, is it in good condition and not leaking, are all hatches and valves closed when not in use? Is the D.O.T. inspection current (within the past year)?
5. **Safety Equipment:** Are the required fire extinguishers in place (tested monthly)? Is the eyewash/safety shower accessible (tested weekly)? Are nitrogen blanket valves and regulators working properly? Check if "OK", otherwise describe problems in Column 5.
6. **Problems:** Describe any problems found.
7. **Corrective action:** If any problems were found, enter the date of corrective actions and what type of action was performed (e.g., replaced leaking pump). Use extra space on this side, if needed.
8. **Inspector:** Enter initials of person who performed inspection.

If extra space is needed to enter any information, write below:

Daily Tank Farm Inspection Log - Licensed Hazardous Waste Facility

See back of sheet for instructions & extra space

Year: June 2014

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1. Date	2. Tanks, pumps, piping, valves, vents, gauges, N ₂ blanket (working, no leaks)						3. Dike & pads	4. Water tanker	5. Safety Equip.	6. Problems - describe	7. Corrective action taken and date performed	8. Inspector initials
	19781	19782	19783	19784	19785	19786						
<u>6/2/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/3/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/4/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/5/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/6/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/9/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
<u>6/10/14</u>	OK	OK	OK	OK	OK	OK	OK	OK	OK		KT	
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RCVD BY MDEC-ACD ON 6/23/14

800 BLOCK TANK LOG
Version 1.2

DATE	MANIFEST	TRA	BLD/TK	#S IN	#S OUT	PH	LEVEL	TOTAL
5/30/14	36671	DC	321 6903-6901	17620		8/8	38%	36600
5/30/14	012285033	PSC 761 210	800	(76030)	**3-1 28380	8	11%	8220
5/31/14	36691	BES	321 6900-6901	17420		8/8	33%	25640
6-2-14	36695	D C	321 6900 6903	18520		9/9	50%	44160
6-3-14	012285034	PSC 761 210	800	74560	1,2,3 ** 6880	8	49%	37280
6-3-14	36701	D C	321 6903 6900	12920		10	64%	50200
6-4-14	012285107	TP 4542	800	—	43220	8/8	11%	6980
6-5-14	36720	D C	321 6900 6901	15300		8/8	30%	22280
6-6-14	36730	D C	321 6900 6901	15420		8/8	50%	37700
6/8/14	36734	DC	321/690 6903	18160		9/9	73%	56360
6/8/14	012285109	DHWA 1618	800		*	9/9	20%	
6/8/14	TRANSFER	TK#	TK# 1 TO TK# 6 (14695)				0%	MT
6/8/14	36738	DC	505/500	18280		11	23%	18280
6-9-14	36739	DC	321 6900-6901	18820		9/9	42%	36560
6-9-14	012285078	PSC 761-210	800		1'2' ** 0	8/8	0%	MT 0
6-9-14	36740	DC	501 15030	9720		6	1	9720
6-9-14	36741	DC	212 6059	9420		6	24%	19140
TANK NO:		19781		CONTENT:		Q 8 6017		

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DC 006143

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RCVD BY MDEQ AOD ON 6/23/14

800 BLOCK TANK LOG
Version 1.2

DATE	MANIFEST	TRA	BLD/TK	#S IN	#S OUT	PH	LEVEL	TOTAL
5/31/14							61%	44400
6.2.14	36700	D C	602/8884 6184	12860			77%	57260
6.3.14	012285034	PSC 761 210	800	5950 7450	1,2,3 4440	8	0	MT
6.4.14	36714	D C	207/ 5853	3540		10	1	3540
6.4.14	36715	D C	602/ 8884	13900		6	24%	17440
6.4.14	36717	D C	505/ 500	15480		8	44%	32920
6.5.14	36719	D C	505/ 500	17840		9	68%	50760
6.6.14	012285035	PSC 761 210	880		3,2 17920	8	47%	32840
6.6.14	36731	D C	505/ 500	15460		8	67%	48300
6-9-14	012285078	PSC 761-210	800		1,2 #8	8	12%	
6.10-14	36749	DC	505/ 500	18960		10		
TANK NO:		19782		CONTENT:		08 6017		

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RCVD BY MDEQ ACD ON 6/23/14

800 BLOCK TANK LOG
Version 1.2

DATE	MANIFEST	TRA	BLD/TK	#'S IN	#'S OUT	PH	LEVEL	TOTAL
5/31/14							29%	19640
6/1/14	36692	DC	505/500	18760		10	54%	38400
6/1/14	36693	DC	602/8884	14780		6	68%	53180
6/1/14	36694	DC	505/500	3860		10	78%	57040
6.2.14	012285055	T.P. 2654	800	---	42660*	9/10	23%	14220
6.2.14	36696	D C	505/500	17420		7	46%	31200
6.2.14	36697	D C	322/7632	2280				34080
6.2.14	36698	D C	501/15030	6080		6		40160
6.2.14	36699	D C	2703/9013	7680		6	67%	47840
6.3.14	012285034	REC 761 210	800	74560 (79260)	12,3 *** 10420	9	55%	39420
6.3.14	36713	D C	505/500	19600		11	80%	57020
6.6.14	012285035	REC 761 210	800	74940	3,2 *** 57020	8	4%	MT
6.7.14	36733	D C	505/500	18760		10	29%	18760
6/8/14	36736	DL	324/5036	13500		6	48%	32260
6/8/14	36737	DC	602/8884	14620		6	68%	46880
6-10-14	012285112	Pana 1623	800		*	8/8	1%	
TANK NO: 19783, CONTENT: O 8 6017								

RCVD BY MDEQ-AQD ON 6/23/14

800 BLOCK TANK LOG
Version 1.2

DATE	MANIFEST	TRA	BLD/TK	#'S IN	#'S OUT	PH	LEVEL	TOTAL
5/29/14							0	MTT
6.4.14	36716	D C	321/ 6800 6801	18960		8/8	29%	18960
6.6.14	36728	D C	212/ 6059 6052	9520		6/6	39%	28480
6.6.14	36729	D C	602/ 8284 6184	15480		6/6	58%	43960
6/8/14	TRANSFER FROM TR#				14695	9	79%	58655
6-9-14	012285111	Dang 1617	800		*			
TANK NO: 197861		CONTENT: 086017						

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Lang, Jennifer (DEQ)

From: Lang, Jennifer (DEQ)
Sent: Thursday, June 12, 2014 10:37 AM
To: 'mike.gruber@dowcorning.com'
Cc: 'steve.moser@dowcorning.com'
Subject: 6/10/14 - Follow Up Inspection Questions
Attachments: 6_10_14 follow up inspection questions.docx

Mike,

I've drafted my report from the inspection on 6/10/14, and I have a few questions that are included in the attached document. If you don't get back with me regarding these until we meet again on 6/24, I'm ok with that since I'll be on vacation next week.

Thanks.

Jennifer Lang, P.E.
Environmental Engineer Specialist
MDEQ - Air Quality Division
989-894-6216 (office)
989-891-9237 (fax)
langj1@michigan.gov

6/10/14 Inspection – Follow Up Questions

1. EU601-01: You mentioned that DC discovered MeCl in the vent(s) during MON testing. Was it determined whether or not the permit needs to be revised as a result? Can you tell me which vent contained MeCl?

The PTI appears to allow MeCl emissions from vent SV601-005 (associated with scrubber no. 5309), but it doesn't address the other two vents (i.e., SV601-009 (scrubber no. 5360) and SV601-026 (scrubber no. 24683)). I noticed that you didn't list this issue as a deviation in your annual Title V ROP deviation report, but I thought I'd follow up with you to make sure.

2. EU800-01: Condition no. III.1 states, a properly operating N2 pressure blanket will have a pressure differential of not less than 5 psig between the N2 inlet and tank exhaust regulator pressures. Following the inspection, it was my understanding that the N2 inlet pressure was maintained at 3 psig. As you know, I did not observe the N2 inlet pressure gauge(s). During the inspection, I observed the N2 outlet pressure gauges, and all gauges registered at less than 8 psig. Therefore, according to the following table, the differential was less than 5 psig on all six tanks. Am I missing something or does this look correct to you?

Tank No.	Inlet Pressure (psig)	Outlet Pressure (psig)	Pressure Differential (psig)	Limit
19782	3	4	1	≥ 5 psig
19781	3	4	1	≥ 5 psig
19783	3	5	2	≥ 5 psig
19786	3	5	2	≥ 5 psig
19784	3	7	4	≥ 5 psig
19785	3	5	2	≥ 5 psig